



Fish & Richardson P.C.
12860 El Camino Real, Suite 400
San Diego, CA 92130
858 678 5070 main
858 678 5099 fax

VIA EMAIL
kjuvinall@orrick.com

July 24, 2023

Kate Juvinall
Orrick Herrington & Sutcliffe LLP
355 S. Grand Avenue, Ste. 2700
Los Angeles, CA 90071

RE: *Zoya Kovalenko v. Kirkland & Ellis LLP, et al.*
U.S. District Court for the Northern District of California, Civil Action No. 4:22-cv-05990-HSG

Dear Ms. Juvinall:

Fish & Richardson P.C. (the “Firm”) objects to the subpoena served on July 13, 2023 by Defendant Kirkland & Ellis LLP, pursuant to Rule 45 of the Federal Rules of Civil Procedures. We enumerate the Firm’s objections below:

1. The Firm objects to the date and location for the production of information requested in the subpoena under Federal Rules of Civil Procedures.
2. The Firm objects to the subpoena to the extent it seeks the Firm’s confidential information and/or information of third parties to whom the Firm owes a duty of confidentiality.
3. The Firm objects to the subpoena as unduly burdensome to the extent it requests information that has already been or could be provided in this litigation by one of the parties or witnesses, and/or is otherwise already within the possession of your client.
4. The Firm objects to the subpoena insofar as the document category requests are vague, ambiguous, indefinite, overly broad, unduly burdensome, duplicative, cumulative, unlimited in time or scope, unintelligible or otherwise unclear as to the precise information sought, particularly with respect to the designation of “all”.
5. The Firm objects to the subpoena to the extent it seeks information protected by the attorney-client privilege and/or work product immunity.
6. The Firm objects to the subpoena to the extent it seeks confidential, trade secret or proprietary information of the Firm.
7. The Firm objects to the subpoena to the extent it causes undue burden and/or expense which outweighs its likely benefit.



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8. The Firm objects to the subpoena to the extent it calls for the Firm to search for electronically stored information that is in the Firm's disaster recovery storage causing undue burden and expense.
9. The Firm objects to the subpoena on that ground that it calls for a legal analysis to interpret requests as unduly burdensome and vague.
10. The Firm objects to the subpoena to the extent it calls for information that the Firm is precluded from producing under Protective Orders or Court Orders issued in underlying Court matters.
11. The Firm has been notified that Zoya Kovalneko will be filing a Motion to Quash in response to the consumer notice and subpoena.
12. The Firm invites you to meet and confer regarding the scope of the production requests. No documents will be produced until the meet and confer has occurred.

Very truly yours,

A handwritten signature in black ink that reads "John W. Thornburgh". The signature is written in a cursive, slightly slanted style.

John W. Thornburgh

JWT/dma

cc: Lynne Hermle (lchermle@orrick.com)
Joseph C. Liburt (jliburt@orrick.com)
Paul Rodriguez (prodriguez@orrick.com)
Mark Thompson (mthompson@orrick.com)
Zoya Kovalenko (zoyavk@outlook.com)